

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WILLIS TOWERS WATSON PUBLIC
LIMITED COMPANY and WILLIS RE INC.,

Plaintiffs,

-v-

PAUL HERRIOTT,

Defendant.

Case No. 21-cv-00487

**DECLARATION OF SCOTT H. CASHER IN SUPPORT OF PLAINTIFFS' MOTION
FOR A TEMPORARY RESTRAINING ORDER AND A PRELIMINARY INJUNCTION**

1. I am a member of the bar of New York and of this Court and a partner at the law firm of White and Williams LLP, counsel in this action for Plaintiffs, Willis Towers Watson Public Limited Company ("WTW") and Willis Re Inc. ("Willis Re") (collectively, "Willis"). As such, I am personally familiar with the facts set forth herein.

2. I submit this Declaration in Support of Willis' Motion for a Temporary Restraining Order and a Preliminary Injunction to enjoin Defendant Paul Herriott in the actions set forth in Willis' Complaint.

3. The relevant facts regarding the merits of Willis' Order to Show Cause are set forth in the accompanying Memorandum of Law, as well as the supporting Declaration of James Bradshaw, and all exhibits attached thereto.

4. Willis is moving by an Order to Show Cause and not by a Notice of Motion because Willis has suffered, and continues to suffer, extensive, irreparable injury as a result of Defendant's breaches of agreements and violations of law, which are continuing.

5. On January 20, 2021, Willis Re commenced an action in this Court against Defendant Paul Herriot.

6. Two days later, on January 22, 2021, Defendant Paul Herriott, represented by Counsel, filed a complaint against Willis in the Superior Court of the State of California, County of San Francisco, CGC-21-589171 (the “California Action”).

7. Willis removed the case to the United State District Court, Northern District of California.

8. Willis attempted to serve Defendant Paul Herriott with the Summons and Complaint for the instant action starting on January 21, 2021. The process server made five separate attempts, including on evenings and weekends, but was unable to serve Defendant.

9. On Monday, January 25, 2021, I sent an email to Defendant’s Counsel (Defendant is represented by two different law firms, who also represent TigerRisk, LLC: one in California, and one in Minnesota) and requested confirmation as to whether they would agree to accept service for this action. Defendant’s Counsel denied my request, advised that they would not accept service for this action, and that they would only accept service for the California Action.

10. Notice of Willis’ Motion for a Temporary Restraining Order and a Preliminary Injunction, and Order to Show Cause, were sent to Defendant’s Counsel via email on January 28, 2021 at 3:45 p.m.

11. Plaintiffs have made no prior application for the relief requested herein.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing Declaration is true and correct.

Dated: January 28, 2021

A handwritten signature in black ink, appearing to read "Scott Casher". The signature is fluid and cursive, with the first name "Scott" and last name "Casher" clearly distinguishable.

By:

Scott H. Casher